

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:**

**WATSON GRINDING &  
MANUFACTURING CO.,**

**Debtor.**

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§  
§  
§

**CASE NO. 20-30967**

**(Chapter 11)**

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**JOHNYCE ADAMS, *ET AL.*,**

**Plaintiffs,**

**vs.**

**WATSON VALVE SERVICES, INC.  
AND WATSON GRINDING AND  
MANUFACTURING, CO.,**

**Defendants.**

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**ADVERSARY NO. \_\_\_\_\_**

**NOTICE OF REMOVAL**

Janet S. Northrup, Chapter 11 Trustee (the “Trustee”) of the Estate of Watson Grinding & Manufacturing Co. (the “Debtor”), files this Notice of Removal of the state court action styled *Johnyce Adams, et al. vs. Watson Valve Services, Inc. and Watson Grinding and Manufacturing Co.*, Cause No. 2020-40081, pending in the 125<sup>th</sup> Judicial District Court of Harris County, Texas (the “State Court Action”).

**I. Procedural Background and Nature of Suit**

1. On July 7, 2020, Johnyce Adams, *et al.* (collectively, the “Plaintiffs”) filed an Original Petition (the “Original Petition”) against Watson Valve Services, Inc. and Watson Grinding and Manufacturing Co. (collectively, the “Defendants”). In their Original Petition, the Plaintiffs assert claims of negligence, nuisance, and trespass against the Defendants.

2. On February 6, 2020 (the “Petition Date”), the Debtor filed its Voluntary Petition under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”), commencing the bankruptcy case captioned *In re Watson Grinding & Manufacturing Co.*, Case No. 20-30967, pending in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Chapter 11 Bankruptcy Case”).

## **II. Basis for Removal**

3. This Notice of Removal is filed pursuant to 28 U.S.C. § 1452, Bankruptcy Rule 9027, and Local Bankruptcy Rules 9027-1, 9027-2, 9027-3, and the *General Order of Reference* entered by the District Court of this District on March 10, 2005.

4. The State Court Action was initiated after the commencement of the Chapter 11 Case. This Notice of Removal has been timely filed pursuant to Bankruptcy Rule 9027. *In re R.E. Loans, LLC*, No. 11-35865, 2012 WL 3262767, at \*2 (Bankr. S.D. Tex. Aug. 8, 2012).

5. Venue in this Court is proper pursuant to 28 U.S.C. § 1409.

6. Cases subject to jurisdiction are removable under the authority of 28 U.S.C. § 1452(a) (“A party may remove any claim or cause of action...to the district court for the district where such civil action is pending, if such district court has jurisdiction of such claim or cause of action under section 1334 of this title”). The State Court Action, including all claims and causes of action asserted therein, is a civil action other than a proceeding before the United States Tax Court. The State Court Action is not a civil action by a government unit to enforce such government unit’s police or regulatory power.

7. This Court has jurisdiction over this case pursuant to 28 U.S.C. § 1334(b) (federal district courts have “original jurisdiction of all civil proceedings...arising in or related to cases under title 11”). The State Court Action “arises in” or, alternatively, is “related to” a Title 11 case, *i.e.* the Debtor’s Chapter 11 Bankruptcy Case. In this circuit, “related to” proceedings include any case whose

outcome “could *conceivably* have any effect on the administration of the estate.” *In re Wood*, 825 F.2d 90, 93 (5th Cir. 1987) (emphasis added); *In re Baudoin*, 981 F.2d 736, 740 (5th Cir. 1993).

8. The resolution of this State Court Action will have a direct impact on the bankruptcy estate of the Debtor. The State Court Action is related to the Debtor’s Chapter 11 Bankruptcy Case because the outcome of State Court Action could conceivably change the Debtor’s rights, liabilities, or options in a way that would have an effect upon the handling and administration of the bankruptcy estate.

9. Thus, the claims asserted in the State Court Action are claims that arise in or are otherwise related to the Debtor’s Chapter 11 Case pursuant to 28 U.S.C. § 1334(b), and removal to this Court is proper pursuant to 28 U.S.C. § 1452(a).

### **III. Core or Non-Core Bankruptcy Jurisdiction**

10. This action involves the administration of the Debtor’s estate and is a proceeding affecting the adjustment of the debtor-creditor relationship; it is, therefore, a core proceeding under 28 U.S.C. § 157(b)(2)(A)(B) and (C). The claims and causes of action in the State Court Action have a clear and direct impact on the interests and property of the Debtor’s estate under 11 U.S.C. § 541.

11. Upon removal of the State Court Action, the Trustee consents to the entry of final orders or judgment by the bankruptcy judge.

### **IV. Parties and Notice**

12. Pursuant to 28 U.S.C. § 1452(a), Federal Bankruptcy Rule 9027(b), and Local Rule 9027-1, all adverse parties are being provided with a copy of this Notice of Removal and a copy of this Notice of Removal is being filed with the clerk of the 125<sup>th</sup> Judicial District Court of Harris County, Texas.

13. In accordance with Local Rule 9027-1(a), the names and addresses of the parties and counsel in the State Court Action, who have or will be served with the notice, are as follows:

BRENT COON & ASSOCIATES Matthew R. Willis 300 Fannin, Suite 200 Houston, Texas 77002  <b>ATTORNEYS FOR PLAINTIFFS</b>	MCCOY LEAVITT LASKEY LLC John V. McCoy Michael I. Ramirez N19 W24200 Riverwood Dr., Suite 125 Waukesha, WI 53188  <b>ATTORNEYS FOR WATSON GRINDING &amp; MANUFACTURING CO.</b>  Gieger, Laborde & Laperouse L.L.C. Ernest P. Gieger, Jr. 701 Poydras Street, Suite 4800 New Orleans, Louisiana 70139  <b>ATTORNEYS FOR WATSON VALVE SERVICES, INC.</b>
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#### **V. Process and Pleadings**

14. Pursuant to Bankruptcy Rule 9027(a)(1) and Local Bankruptcy Rule 9027-1(b), true and correct copies of all process and pleadings filed in the State Court Action (as set forth in the attached Exhibit “A”) have been provided to this Court.

15. In accordance with Bankruptcy Rule 9027(c), the Trustee will promptly file a notice of the filing of this Notice of Removal in the State Court Action.

WHEREFORE, the Trustee notifies the United States Bankruptcy Court for the Southern District of Texas, Houston Division, that the State Court Action is hereby removed in its entirety to this Court pursuant to 28 U.S.C. § 1452(a) and Bankruptcy Rule 9027.

Dated: August 7, 2020.

Respectfully submitted,

**JONES MURRAY & BEATTY, LLP**

By: /s/ Ruth Van Meter  
Erin E. Jones  
Texas Bar No. 24032478  
Ruth Van Meter  
Texas Bar No. 20661570  
Jacqueline Q. Pham  
Texas Bar. No. 24116899  
4119 Montrose Blvd, Suite 230  
Houston, Texas 77006  
Phone: 832-529-1999  
Fax: 832-529-5513  
[erin@jmbllp.com](mailto:erin@jmbllp.com)  
[ruth@jmbllp.com](mailto:ruth@jmbllp.com)  
[jackie@jmbllp.com](mailto:jackie@jmbllp.com)

**SPECIAL COUNSEL FOR JANET S.  
NORTHROP, CHAPTER 11 TRUSTEE OF THE  
ESTATE OF WATSON GRINDING &  
MANUFACTURING CO.**

**HUGHESWATTERSASKANASE, LLP**

By: /s/ Wayne Kitchens  
Wayne Kitchens  
Texas Bar No. 11541110  
Heather McIntyre  
Texas State Bar No. 24041076  
Total Plaza  
1201 Louisiana, 28<sup>th</sup> Floor  
Houston, Texas 77002  
Telephone: (713) 759-0818  
Facsimile: (713) 759-6834  
[wkitchens@hwa.com](mailto:wkitchens@hwa.com)  
[hmcintyre@hwa.com](mailto:hmcintyre@hwa.com)

**COUNSEL FOR JANET S. NORTHROP,  
CHAPTER 11 TRUSTEE OF THE ESTATE OF  
WATSON GRINDING & MANUFACTURING  
CO.**

AND

**McCOY LEAVITT LASKEY, LLC**

By: /s/ Michael I. Ramirez  
Michael I. Ramirez  
Texas Bar No. 24008604  
20726 Stone Oak Parkway, Suite 116  
San Antonio, TX 78258  
Telephone (210) 446-2828  
Fax (262) 522-7020  
[mramirez@mlllaw.com](mailto:mramirez@mlllaw.com)

**COUNSEL FOR WATSON GRINDING &  
MANUFACTURING CO.**

**CERTIFICATE OF SERVICE**

I certify that on August 7, 2020, a true and correct copy of the foregoing Notice was served via ECF/PACER to all parties registered to receive such service and via first class mail (without attachments) on a date to be supplemented to the following:

<p>BRENT COON &amp; ASSOCIATES Matthew R. Willis 300 Fannin, Suite 200 Houston, Texas 77002</p> <p><b>ATTORNEYS FOR PLAINTIFFS</b></p>	<p>McCOY LEAVITT LASKEY LLC John V. McCoy Michael I. Ramirez N19 W24200 Riverwood Dr., Suite 125 Waukesha, WI 53188</p> <p><b>ATTORNEYS FOR WATSON GRINDING &amp; MANUFACTURING CO.</b></p> <p>Gieger, Laborde &amp; Laperouse L.L.C. Ernest P. Gieger, Jr. 701 Poydras Street, Suite 4800 New Orleans, Louisiana 70139</p> <p><b>ATTORNEYS FOR WATSON VALVE SERVICES, INC.</b></p>
--	---

/s/ Ruth Van Meter  
Ruth Van Meter

**EXHIBIT A**

**2020-40081**

**COURT:** 125th

**FILED DATE:** 7/7/2020

**CASE TYPE:** Premises



**ADAMS, JOHNYCE**

Attorney: WILLIS, MATTHEW R.

**VS.**

**WATSON VALVE SERVICES, INC.**

**Docket Sheet Entries**

**Date**

**Comment**



CAUSE NO. \_\_\_\_\_

JOHNCYE ADAMS, ET AL	§	IN THE DISTRICT COURT OF
Plaintiffs,	§	
	§	
vs	§	HARRIS COUNTY, TEXAS
	§	
WATSON VALVE SERVICES, INC.,	§	
WATSON GRINDING AND	§	
MANUFACTURING, CO.	§	
Defendants.	§	_____ JUDICIAL DISTRICT

**PLAINTIFFS' ORIGINAL PETITION AND REQUEST FOR DISCLOSURE**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW Plaintiffs, JOHNCYE ADAMS, ET AL, complaining of Defendants, Watson Valve Services, Inc., (Hereinafter referred to as "WATSON VALVE") and Watson Grinding and Manufacturing, Co. (Hereinafter referred to as "WATSON") and show the following:

**INTRODUCTION**

1. This is a civil action brought on behalf of Plaintiffs who suffered personal injuries (Personal Injury Plaintiffs), personal losses (Personal Loss Plaintiffs) and property losses (Property Loss Plaintiffs), all who seek monetary compensation for their damages and losses as a result of the WATSON incident described herein.

**DISCOVERY CONTROL PLAN**

2. Pursuant to Rule 190.4 of the Texas Rules of Civil Procedure, Plaintiffs assert that the complexities of this case will demand that the Court order a discovery control plan specific for this case.

### **REQUEST FOR DISCLOSURE**

3. Pursuant to Rule 194 of the Texas Rules of Civil Procedure, WATSON is requested to disclose within fifty (50) days of service of this request, the information or material described in Rule 194.2.

### **PARTIES**

4. Each individual plaintiff herein is listed in the spreadsheet attached hereto and fully incorporated by reference as **Exhibit A**. In addition to the name, the spreadsheet lists each plaintiff's county of residence, the last four digits of their social security number, and an indication as to the category of damages being asserted by each.
5. Defendant, WATSON VALVE SERVICES, INC. (hereinafter "WATSON VALVE") is a domestic corporation doing business in the State of Texas who may be served with process by and through its registered agent, John M. Watson, at 14525 Gessner Road, Houston, Texas 77041.
6. Defendant, WATSON GRINDING AND MANUFACTURING, CO. (hereinafter "WATSON") is a domestic corporation doing business in the State of Texas who may be served with process by and through its registered agent, John M. Watson, at 14525 Gessner Road, Houston, Texas 77041.

### **JURISDICTION**

7. Jurisdiction is proper because of the amount in controversy exceeds the minimum jurisdictional limits of this Court.
8. Venue is proper in Harris County, Texas pursuant to Tex. Civ. Prac. & Rem. Code §15.002(a)(1) because all or a substantial part of the events or omissions giving rise to Plaintiffs' claims occurred in Harris County, Texas.

### **FACTS**

9. In the early morning hours of January 24,2020, an explosion occurred at Watson Grinding and Manufacturing, located at 4525 Gessner Road, Houston, Texas. Plaintiffs' properties were destroyed by the explosion. At all times relevant to the incident, Defendants WATSON and/or WATSON VALVE controlled and continues to control the premises where the explosion originated. As result of the explosion, Plaintiffs suffered significant physical injuries and damages to their personal and premises.

### **CAUSES OF ACTION**

#### **NEGLIGENCE**

10. Plaintiffs repeat and re-allege each allegation above herein.
11. WATSON had a duty to exercise ordinary care as a reasonable and prudent company would have acted under the same or sear circumstances. WATSON breached its duty in one or more respects including, but not limited to failing to:
- a. Failing to create and /or enforce safety rules and guidelines;
  - b. Contributing to and failing to provide an unsafe wok site;
  - c. Failing to recognize and remediate hazards, including hazards with an extreme degree of risk;
  - d. Participating in and contributing to acts that caused the incident in question, including the poisoning of propylene and natural gas in proximity of one another without adequate safety measures and protections;
  - e. Failing to provide timely assistance, or to ensure other protections were in place;
  - f. Failing to warn of know hazard;
  - g. Failing to read, understand, and follow published safe work policies and procedures;

- h. Promulgating and following unsafe work policies;
  - i. Creating latent dangers, but failing to warn of same;
  - j. Failing to provide adequate equipment and competent personnel;
  - k. Failing to ensure a safe work area;
  - l. Failing to institute precautionary measures to protect individuals such as plaintiffs;
  - m. Failing to use proper equipment
  - n. Failure to properly plan;
  - o. Failing to properly and timely fix hazards; and
  - p. Using incorrect, insufficient or defective systems for propylene and /or natural gas and keeping these two extendedly combustible materials near one another.
12. Each of the WATSON's acts and/or omissions constituted negligence and each proximately caused the injuries and damages sustained by Plaintiffs.

### **NUISANCE**

13. Plaintiffs repeat and re-allege each allegation above herein.
14. The WATSON Incident created a *private nuisance* that substantially interfered with Plaintiffs' property owners' interest in the use and enjoyment of their properties and caused them unreasonable discomfort or annoyance. These Plaintiffs seek recovery of all of its actual, special, consequential, incidental, and other damages, harms, and losses resulting from the nuisance created by WATSON.
15. The WATSON Incident created a *public nuisance* causing harm that was different in kind from that suffered by the general public because WATSON's acts or omissions interfered with Plaintiffs' ability to access, operate and use their property.
16. WATSON's conduct interfered with a public right. WATSON's conduct adversely affected all or a substantial part of the community. WATSON's conduct was unreasonable because it involved a

significant interference with the public's health, safety, peace, comfort, or convenience and is continuing in nature and produced a permanent or long-lasting effect that WATSON knew or should have known would have a significant effect on a public right.

17. WATSON's conduct caused a special injury to Plaintiffs, for which they seek recovery of all special, consequential, incidental, and other damages, harm and losses resulting from the nuisance it created.

### **TRESPASS**

18. Plaintiffs repeat and re-allege each allegation above herein.
19. WATSON trespassed against Plaintiffs when it physically, intentionally, and voluntarily interfered with Plaintiffs' right to possess their properties. Accordingly, Plaintiffs seek recovery of all of its actual, special, consequential, incidental, and other damages, and losses, including cost of restoration or repair, loss of use of land, loss of expected profits from the use of land, loss of market value of land, loss of market value of buildings, and lost profits caused by WATSON's trespass. Plaintiffs also seek recovery of exemplary damages.

### **DAMAGES**

20. Plaintiffs repeat and re-allege each allegation above herein.
21. As a direct and proximate result of the wrongful acts and/or omissions of WATSON, Plaintiffs have suffered damages, including but not limited to the following:
- a. Real property and personal property damage;
  - b. Medical expenses in the past and into the future;
  - c. Pain and suffering in the past and into the future;
  - d. Mental anguish in the past and into the future;
  - e. Physical impairment in the past and into the future; and/or
  - f. Loss of consortium and companionship in past and future;

- g. Loss of household services in the past and future;
- h. All other relief to which Plaintiffs may be justly entitled.

**DEMAND FOR JURY TRIAL**

22. Plaintiffs demand a trial by jury on all of their claims.

**PRAYER**

23. Plaintiffs pray that WATSON be cited to appear and answer herein, and that upon final trial they recover judgment against WATSON for the following:

- a. All actual, special, consequential, incidental, and other damages, harms and losses, including but not limited to loss of market value of land, cost of repair, loss of use of land, out of pocket damages, lost profits and loss of business goodwill, as well as all bodily injury damages alleged and proven herein;
- b. Costs of court;
- c. Pre- and post-judgment interest at the maximum rate allowed by law;
- d. All other relief to which Plaintiffs are entitled, at law or in equity.

Respectfully submitted,

/s/ Matthew R. Willis

MATTHEW R. WILLIS

State Bar No. 21648600

Email: matt.willis@bcoonlaw.com

**BRENT COON & ASSOCIATES**

300 Fannin, Suite 200

Houston, Texas 77002

Telephone: (713) 225-1682

Facsimile: (713) 225-1785

**ATTORNEYS FOR PLAINTIFFS**

# **EXHIBIT A**

	First Name	Last Name	County of Residence	Last Four of Social Security Number	If Minor, Last Four of SSN for Adult Representative	Personal Injury Damages	Lost Wages	Property Damage
1	Johnyce	Adams	Harris	5216				
2	Adam	Alani	Harris	0055				
3	Mark	Allen	Harris	0573				
4	J.A.		Harris		Daphne Griffin – 1351			
5	John	Andresen	Harris	7098				
6	Fernando	Arias	Harris	1068				
7	Mike	Ayers	Harris	9796				
8	Michael	Berry	Harris	7827				
9	Tricia	Berry	Harris	5803				
10	Vicente	Cardoso	Harris	1490				
11	Tara	Carter	Harris	3477				
12	Anna	Castro	Harris	7441				
13	Reda	Choukair	Harris	1680				
14	Ronnie	Ellis	Harris	8411				
15	Johnathan	Galvan	Harris	8930				
16	Linda	Garcia	Harris	4105				
17	Martin	Garcia	Harris	4961				
18	Veronica	Garcia	Harris	5888				
19	Daphne	Griffin	Harris	1351				
20	Dellia	Hall	Harris	9949				
21	Fay	Hall	Harris	4781				
22	Leslie	Hall	Harris	3312				
23	Da'Aron	Harmon	Harris	5633				
24	Michael	Jeffcoat	Harris	1761				
25	Dwanae	Jorden	Harris	2633				
26	Alexander	Lee	Harris	1632				
27	Herbert	Maduro	Harris	5949				
28	E.M.		Harris		Veronica Garcia – 5888			
29	Valeriano	Mendoza	Harris	8699				
30	Eric	Morales	Harris	4486				
31	Rolando	Morales	Harris	4788				
32	Salvador	Morales	Harris	2942				
33	A.M.		Harris		Erica Moreno – 4520			
34	Erica	Moreno	Harris	4520				
35	J.M.		Harris		Erica Moreno – 4520			
36	M.M.		Harris		Erica Moreno – 4520			
37	R.M.		Harris		Erica Moreno – 4520			
38	Eduardo	Ocon	Harris	8074				
39	C.O.		Harris		Francisco Olivo – 9709			
40	Francisco	Olivo	Harris	9709				
41	J.O.		Harris		Francisco Olivo – 9709			
42	Maria	Olivo	Harris					
43	E.Q.		Harris		Eunice Quill - 2757			
44	Eunice	Quill	Harris	2757				
45	Ray	Riley	Harris	3168				
46	Rita	Rivera	Harris	7011				
47	Jose	Sanchez	Harris					
48	Larry	Seligmann	Harris	5209				
49	Dale	Singleton	Harris	5104				
50	Nadia	Slack	Harris	0793				
51	Ricardo	Sutton	Harris	9181				
52	J.T.				Dellia Hall – 9949			
53	Jose	Vazquez	Harris	2128				
54	Lenetta	Webbert	Harris	1437				
55	Temika	Webbert	Harris	1818				



56	Joseph	Wells	Harris	9119				
57	Jaclyn	Williams	Harris	1227				
58	Stefanie	Young	Harris	7356				

7/7/2020 11:21:38 AM  
 Marilyn Burgess - District Clerk  
 Harris County  
 Envelope No: 44298953  
 By: MOMON, RHONDA M  
 Filed: 7/7/2020 11:21:38 AM



# Marilyn Burgess

## HARRIS COUNTY DISTRICT CLERK

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5800 | www.hcdistrictclerk.com

### Request for Issuance of Service

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original Petition and Request for Disclosure

FILE DATE: 07/07/2020 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be

Served):

Issue Service to: Watson Valve Services, Inc.

Address of Service: 14525 Gessner Road

City, State & Zip: Houston, Texas 77041

Agent (if applicable) John W. Watson

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- |  |   |  |   |
|--|---|--|---|
| <input checked="" type="checkbox"/> Citation                   | <input type="checkbox"/> Citation by Posting          | <input type="checkbox"/> Citation by Publication | <input type="checkbox"/> Citations Rule 106 Service |
| <input type="checkbox"/> Citation Scire Facias                 | Newspaper _____                                       |  |   |
| <input type="checkbox"/> Temporary Restraining Order           | <input type="checkbox"/> Precept                      | <input type="checkbox"/> Notice                  |   |
| <input type="checkbox"/> Protective Order                      |   |  |   |
| <input type="checkbox"/> Secretary of State Citation (\$12.00) | <input type="checkbox"/> Capias (not an E-Issuance)   | <input type="checkbox"/> Attachment              |   |
| <input type="checkbox"/> Certiorari                            | <input type="checkbox"/> Highway Commission (\$12.00) |  |   |
| <input type="checkbox"/> Commissioner of Insurance (\$12.00)   | <input type="checkbox"/> Hague Convention (\$16.00)   | <input type="checkbox"/> Garnishment             |   |
| <input type="checkbox"/> Habeas Corpus                         | <input type="checkbox"/> Injunction                   | <input type="checkbox"/> Sequestration           |   |
| <input type="checkbox"/> Subpoena                              |   |  |   |
| <input type="checkbox"/> Other (Please Describe) _____         |   |  |   |

(See additional Forms for Post Judgment Service)

#### SERVICE BY (check one):

- |  |   |
|--|---|
| <input type="checkbox"/> ATTORNEY PICK-UP (phone) _____  | <input checked="" type="checkbox"/> E-Issuance by District Clerk<br>(No Service Copy Fees Charged)  |
| <input type="checkbox"/> MAIL to attorney at: _____  | <b>Note:</b> The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.<br>Visit <a href="http://www.hcdistrictclerk.com">www.hcdistrictclerk.com</a> for more instructions. |
| <input type="checkbox"/> CONSTABLE   |   |
| <input type="checkbox"/> CERTIFIED MAIL by District Clerk  |   |
| <input type="checkbox"/> CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____ |   |
| <input type="checkbox"/> OTHER, explain _____  |   |

Issuance of Service Requested By: Attorney/Party Name: Matthew R. Willis Bar # or ID 21648600

Mailing Address: 300 Fannin, Suite 200, Houston, Texas 77002

Phone Number: 713-225-1682



# Marilyn Burgess

HARRIS COUNTY DISTRICT CLERK

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5800 | www.hcdistrictclerk.com

## Request for Issuance of Service

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original Petition and Request for Disclosure

FILE DATE: 07/07/2020 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Watson Grinding and Manufacturing, Co.

Address of Service: 14525 Gessner Road

City, State & Zip: Houston, Texas 77041

Agent (if applicable) John W. Watson

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- ☒ Citation   
 ☐ Citation by Posting   
 ☐ Citation by Publication   
 ☐ Citations Rule 106 Service  
☐ Citation Scire Facias   
 Newspaper \_\_\_\_\_  
☐ Temporary Restraining Order   
☐ Precept   
☐ Notice  
☐ Protective Order  
☐ Secretary of State Citation (\$12.00)   
☐ Capias (not an E-Issuance)   
☐ Attachment  
☐ Certiorari   
☐ Highway Commission (\$12.00)  
☐ Commissioner of Insurance (\$12.00)   
☐ Hague Convention (\$16.00)   
☐ Garnishment  
☐ Habeas Corpus   
☐ Injunction   
☐ Sequestration  
☐ Subpoena  
☐ Other (Please Describe) \_\_\_\_\_

(See additional Forms for Post Judgment Service)

### SERVICE BY (check one):

- ☐ ATTORNEY PICK-UP (phone) \_\_\_\_\_  
☐ MAIL to attorney at: \_\_\_\_\_  
☐ CONSTABLE  
☐ CERTIFIED MAIL by District Clerk  
☒ E-Issuance by District Clerk  
 (No Service Copy Fees Charged)  
**Note:** The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents. Visit [www.hcdistrictclerk.com](http://www.hcdistrictclerk.com) for more instructions.  
☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_  
☐ OTHER, explain \_\_\_\_\_

Issuance of Service Requested By: Attorney/Party Name: Matthew R. Willis Bar # or ID 21648600

Mailing Address: 300 Fannin, Suite 200, Houston, Texas 77002

Phone Number: 713-225-1682